

Exhibit Cover Page

EXHIBIT NUMBER 2

SAC Incident

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1. Young speech at Vigil

34 Notice to Raymond given on Nov. 29 regarding this by Haverford alumna and by The Deborah Project demand letter (SAC Exhibit B) to President Rayment of Feb. 7, 2024

“Plaintiffs discussed among themselves” in the Whasapp group, which included all Plaintiffs

All Plaintiffs had learned of this event by May 13, 2024

2. Admissions interviewers rejected because they were Zionists

40 Notice: Administrators were present and witnessed it and did nothing
One anonymous Member of Jews at Haverford, who cannot be identified here without disclosing the student’s identity, present and witnessed this event.

All other Plaintiffs learned of this event by May 13, 2024

3. Political Science Department postings glorifying Oct. 7 attacks

46 Content of postings
47 Plaintiffs aware of the posts and filed bias reports regarding both posts, notifying Haverford.
Haverford failed to respond.
Brought posts to the attention of Haverford administrators directly. Nothing done.

4. Aougab Posts

49 Discussed in Plaintiffs’ whatsapp group.
57. All Plaintiffs aware of and injured by them.
59 Feb. 27 2024 letter by alumna to President Raymond; Members of Jews at Haverford including an alumna and a parent of a current math student gave notice to President Raymond
TDP Demand letter February 9, 2024

5. Professor Velasco’s posts

55 Velasco post complained of by alumna to President Raymond on Dec. 11, 2023
Further complaint about Velsasco blaming Zionists for Vermont shooting complained of by alumna to Raymond on Jan. 15, 2024
No response
Made known to Haverford leadership no later than May 13, 2024
Made known to all Plaintiffs no later than May 13, 2024

6. Professor Ha Posts

51-53 Ha posts put up between Aug. 15-19, 2024
55 made known to all Plaintiffs before Sept. 9, 2024, and to Haverford on Sept. 9, 2024

7. Disparity between treatment of Professor Mendelsohn and Treatment of Professors Aougab, Ha and Velasco and Vice President Young

62 Mendelsohn gives a teach-in on the event, is told by College administrators his event needs diversity
63 Velasco gives a completely one-sided teach-in, is not instructed to provide diversity. Event is so hostile to the Jewish commitment to Israel that a parent submits a complaint to President Raymond. No response.
66 Mendelsohn himself complains about antisemitism at Haverford, is attacked by 600 people.
68. Provost Strong-Leek initiates bias investigation against Mendelsohn.
72. Discriminatory treatment of Professor Mendelsohn known to all Plaintiffs.

7. ADL event

82 McKnight, Raymond and Nikki Young physically present – saw and heard. Did nothing
Bias report submitted
Shortly thereafter, Haverford alumna wrote to President Raymond – including inaction of security, which was present and did nothing
83 Letter of faculty member Richard Freedman writes to President Raymond
No response
86 All Plaintiffs other than Ally Landau knew about the event either while it was happening or immediately after it ended

8. Fall Plenary

92 All Plaintiffs present and witnessed
94 Raymond and McKnight had authority to intervene, were asked to intervene and failed to take any effective action.
96 Six parents of Haverford students wrote to Raymond on Nov. 16, 2023 describing impact of the event on their children
97 No response; President Raymond praises the procedures followed at Plenary

9. Grievances document issued campus wide, attacking Ally Landau

99 Event described
100 Attack on Ally

- 102. Document’s attack on Ally, and administration’s failure to protect her, known by every Plaintiff
- 103 Raymond advised by Ally’s parents of the threat the letter contained about their daughter
- 104 At least one member of the administration admitted that the Grievances document contained “elements . . . reasonably read as antisemitic.” Raymond offered only “restorative justice,” i.e. enforcement of the Honor Code, subjecting Ally to more abuse from the same people. Raymond praises the Grievances document.

10. Emergency Plenary

- 109 All Plaintiffs aware – either present for some or all or deliberately chose to avoid because they knew it would consist only of denunciations of their beliefs

Student council co-Presidents admit to a member of Jews at Haverford that Plenary rules had not been followed

- 111 Letter from alumnus Bryan Hawthorne and an alumna, identifying rule violations. No response.
- 112 Raymond praises procedure followed by emergency Plenary to get the anti-Israel resolution passed

11. Spring Plenary

- 114 Parent of Jewish Haverford student wrote to President Raymond immediately after the event to tell Raymond that the writer’s son had felt forced to lie and deny his own beliefs. “I am devastated.” Also informs Raymond that Jewish students “have felt fearful, silenced or a protective need to self-censor.” No response.
- 114 Events of Spring Plenary discussed in Plaintiffs’ WhatsApp Group, through which all Plaintiffs learned about it
- 117 Immediately after Spring Plenary President Raymond admitted that she knew that students, particularly Jewish students, “have felt fearful, silenced or a protective need to self-censor” – thus quoting the above letter Raymond had received from the parent of the Jewish student who had been forced to vote against his commitments at Spring Plenary. But Raymond did nothing to remedy the problem whose existence she had acknowledged.

12. Jewish state spreading disease event

- 118 Complaints submitted by students, alumni, parents and Jewish community members Discussed in Whatsapp group by all plaintiffs.
- 120 Event described in Plaintiffs’ WhatsApp group as “New antisemitism achievement”
- 119. Dean McKnight aware of complaints. Responded by suggesting a change of title, which made it worse.

- 120 Student complains about the event “to Wendy.” No change in content of event. Fact of
complaint, and President Raymond’s failure to respond, discussed in plaintiffs’ WhatsApp
group
122 Event defended by Haverford as protected and valued speech.

13. Sit-in at Founders Hall

- 123 Event described
127 All plaintiffs knew about it and endured harassment
127 Raymond praises as “peaceful protest,” no punitive action would be taken
128 Ally’s parents discussed event with Raymond, who admitted to them that it violated
campus rules but that if she enforced the rules “worse behavior by students would result”

14. Jewish students screen movie on campus about the Hamas attack, April 14, 2024

- 129 Haverford students demand to Raymond that she apologize for inviting Zionists to campus
One Jewish student who witnessed the demand wrote to Raymond asking how she could
tolerate such a demand without stating that students like the writer, who are Zionists,
have the right to be on campus.
130 No response

All Plaintiffs aware of these facts by May 13, 2024

15. Encampment and Liberated Zone

- 132 Access to the campus’s central building and college green
All plaintiffs either personally experienced this or knew about it from others who had.
133, 135 All plaintiffs either personally experienced this or knew about it from others who
had
Parent wrote to Raymond demanding to know how her child could prepare for finals
given attacks on Jewish students on campus
134 Haverford leadership did nothing.
136 One student wrote to Raymond to complain, saying

I know that I, and many of my friends, have repeatedly spoke to you about the impact of
such conduct on our ability to survive as Jews and as students at this college. You’ve
done nothing in the past and you’re doing nothing now. Where are you?

- 137 No reply.

16. Incoming students Whatsapp group drives a new Zionist student away from Haverford

- 138 Jewish student accepted to the College changes his plans because as soon as he admits to
having gone to Jewish day school, he’s asked if he’s a Zionist, and when he says yes he’s
attacked.
139 Incoming student advises McKnight. McKnight says only remedy is to invoke the Honor

Code. Incoming student refuses to seek relief from the people who are attacking him.
140 No further action taken by the College
Event discussed in the Plaintiffs' WhatsApp group. All Plaintiffs knew about it and about
the College's failure to do anything about it.

17. Customs

141 Event described
143 Jewish students ask for permission to insert their concerns into the orientation materials,
which are otherwise filled with pro-Palestine and anti-Israel messages
146 met with anger and disgust at the Customs session.
147 Other students demand an apology from Haverford College for being asked to consider
the Presentation.
148 Haverford apologizes.
150 Haverford administrators with responsibility for the event notified of the problem before
the orientation preparation event took place.
151 All Plaintiffs either experienced the event themselves or aware immediately after it
occurred.

18. Posters torn down; no serious investigation and mockery follow

152-53 posters pulled down, multiple times in multiple buildings.
Brought attention of President Raymond and other senior administrators
Investigation conducted with inconclusive result, suggesting the wind brought down
posters which were put up indoors, and posters found crumpled up on the floor near
where they had been posted.
155 College presents award to student who mocked the problem

All Plaintiffs aware of this event by Sept. 9, 2024

19. Campus student organization adopts platform of eliminating Israel "by all means
necessary."

156 Event described
Known to all Plaintiffs
Complaint to Raymond, of which Plaintiffs also aware
No response

20. Cancellation of antisemitism awareness event

158 Event described
159 McKnight informs Ally that public promotion of antisemitism awareness could prompt
unrest that the College could not or would not prevent. She understands she has no
choice but to cancel the event.
160 All plaintiffs new about this. Parents and alumni complained to Dean McKnight and
President Raymond, including
161 Ally's parents.

21. Community leaders' communications to College leadership about hostile environment for Jewish students on campus

35, 36 Events described.

All Plaintiffs aware of this by Sept. 9, 2024

21. Jewish community leaders meet with Haverford's leadership, including Vice President Young, Dean McKnight, Provost Linda Strong-Leek, and the President's Chief of Staff, Jesse Lyttle

- 164 Haverford leaders hear the Jewish community representatives' expression of concern about the welfare of the Jewish students on campus

Vice President Young affirmatively states that Haverford will not address these concerns. At the second meeting Young states that it is the College's policy that for Jews to feel safe on campus they must "condemn "genocide," by which she meant that for Jews to feel safe on Haverford's campus they must take the position that Israel's actions its war against Hamas constitute genocide.

All Plaintiffs aware of this by Sept. 9, 2024

22. Ally's Parents speak with the College's Board President about antisemitism on campus

- 3 January 2024, the College's Board President acknowledged to Ally Landau's parents the "slowness and inadequacy" of the College's response both to antisemitism on campus generally and to threats to Plaintiff Ally Landau in particular